

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA**

ALEXANDRIA DIVISION

UNITED STATES OF AMERICA)	
)	Case No.: 1:22-CR-226
)	
v.)	Hon. T.S. Ellis, III
)	
LATAE'VEION NAVIEOUR WOODS)	Hearing: April 14, 2023
Defendant.)	
_____)	

SENTENCING MEMORANDUM

Mr. Woods' childhood and upbringing presented a series of nearly unfathomable obstacles. Despite those challenges, he was able to conduct himself as a law abiding, contributing member of society until this horrible tragedy. Since that time, he has been remorseful and accepting of his mistakes and has vowed to work to atone for his misjudgments. When released on bond and given the opportunity to prove himself, Mr. Woods returned to his roots of as an employed, productive citizen. For these reasons and the specifics that follow in this memorandum, Mr. Woods respectfully requests a punishment that treats him with leniency and mercy.

Mr. Woods' Background

Mr. Woods's mother was only 16 years old when he was born. His father was also a teenager. Mr. Woods had no contact with his biological father until well after childhood and even then, it was on only one occasion. As a young teen, his mother was incapable of raising Mr. Woods. Instead of raising him, she gave up her parental rights to a mentor in a program she was participating in for pregnant teens. During his childhood, Mr. Woods knew who his mother was but only had sporadic contact with her until he reached adulthood. His childhood was

particularly confusing for him. Despite the confusion, Mr. Woods did well for himself and enrolled in college in 2019. Unfortunately, the school closed shortly after he enrolled due to the COVID pandemic. Financial difficulties left him unable to continue his schooling, so he focused his energy and ambition on job opportunities and entered the workforce.

Despite these trials and tribulations Mr. Woods avoided any troubles with the law. In 2022 he moved in with his biological family. Some members of his biological family have been implicated in very serious criminal behavior and it appears that these relationships negatively impacted Mr. Woods leading to the unlawful conduct at issue in this case.

Mr. Woods has demonstrated that when the negative influences are removed from his life he can make very positive decisions. He was incarcerated on related state charges in Prince William for 4 months from May 11, 2022 until those charges were dropped in lieu of the federal charges on September 12, 2022. He was then granted a bond in Federal Court and remained at liberty from September 15 until January 5th, 2023. During those , he was ordered to comply with a stringent series of terms and conditions, and he was able to successfully abide with everything that was asked of him. He also managed to find gainful employment with Amazon during this time.

Factors to be considered


The factors to be considered in fashioning a fair and just punishment for Mr. Woods illustrate why he deserves mercy. He has expressed sincere remorse for the tragic consequences of his actions and plans to work in the future to make sure that young people avoid a similarly tragic consequence. This behavior was truly an outlier in a life generally dedicated to overcoming obstacles in a law-abiding way. This Court will be required to impose some incarceration. Any further loss of freedom will certainly be a powerful experience for someone

who has never experienced incarceration prior to the events that bring him before this Court. Additionally, to the extent that one can predict future behavior of an individual, Mr. Woods has demonstrated that he can live a law-abiding life as he did while he was released on bond and prior to this incident.

18 USC 3553 requires the court to impose a sentence sufficient but not greater than necessary. Among factors integral to consideration of a just sentence, this Court should look at the history and characteristics of the defendant, the need to afford adequate deterrence to criminal conduct, and the need to protect the public from further crimes of the defendant. The serious nature of the Defendant's crime and the tragic consequences cannot be overstated. However, Mr. Woods has realized the error of his actions, is remorseful and has vowed to change his ways such that he will never be in this position again. Mr. Woods' performance while on pretrial monitoring is evidence that he will similarly remain lawful during his mandatory supervision after his release. To that extent, the Court should feel confident that a sentence favorable to Mr. Woods will still be sufficient to obtain the goals sought under the sentencing statute.

For these reasons, and others that will be presented at the sentencing hearing, a sentence favorable to Mr. Woods will still be sufficient to satisfy the goals of 18 USC 3553.

Respectfully submitted,
Latae'veion Woods
By Counsel

A handwritten signature in black ink, appearing to read 'Faraji Rosenthal', written over a horizontal line.

Faraji Rosenthal
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Good morning Your Honor,

Over this past 8-12 months, I have been in deep thought about the crime I committed. While there is nothing I did that was intentional, I am still very devastated for not only Andy, but for Andy's parents... I am also upset because those pills are still out there on the streets causing a mass destruction too society. I will do the time the court decides to give me but when I am released it won't stop there.. I seek on talking too kids and teens that have a drug addiction or who are around drugs in general... the picture that they portrayed of me is very inaccurate. I cared for Andy and would never have done anything or given him anything to intentionally hurt him... The decisions I have made caused a huge impact on my life and I would like to talk to kids and teens about what I have learned through my mistakes so they won't make the same ones that I have made. I know an apology is not enough for what happened but I am truly sincerely sorry about what has happened and for my actions. When I am granted a true second chance at life on the other side of these walls nothing like this will ever happen again under my name your honor.

Thank you for taking the time to read this letter. I hope you show general mercy towards me...

- Lataeveion Woods

Good Morning Your Honor,
 Over this past ~~8-12~~ 8-12 months, I have been in deep thought about the crime I committed. While there is nothing I did that was intentional, I am still very devastated for not only Andy, but for Andy's parents... I'm ~~also~~ ^{also} upset because these pills are still out there on the streets causing a mass destruction too society. I will do the time that the court decides to give me. But when I am released it won't stop there... I seen on talking too kids and teens that have a drug addiction or who are around drugs in general... The picture that they portrayed of me is very inaccurate. I cared for Andy and would never have done anything or given him anything to intentionally hurt him... The decisions I have made caused a huge impact on my life. And I would like to talk to kids and teens about what I have learned through my mistakes so they won't make the same ones that I have made. I know an apology is not enough for what has happened, but I am truly sincerely sorry ~~about what has happened~~ ^{about what has happened} and for ~~my~~ ^{my} actions. When I am granted a true second chance at life on the other side of these walls nothing like this will ever happen again under my name Your Honor.
 Thank you for ^{taking} the time out too read this letter, I hope you show General Mary towards me...

- LATAEVEION
 WOODS